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SECURITIES AND EXCHANGE COMMISSION
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ANNUAL AUDITED REPORT  
FORM X-17A-5  
PART III

SEC FILE NUMBER
87072

FACING PAGE

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING 10/01/14 AND ENDING 09/30/15  
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF BROKER - DEALER:

FIRST COMMAND FINANCIAL PLANNING, INC.

OFFICIAL USE ONLY
FIRM ID. NO.

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

1 FirstComm Plaza  
(No. and Street)

Fort Worth Texas 76109  
(City) (State) (Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

Michael F. Morrison (817) 731 - 8621  
(Area Code - Telephone No.)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report\*

Weaver and Tidwell, LLP  
(Name - if individual, state last, first, middle name)

2821 West Seventh Street, Suite 700 Fort Worth Texas 76107  
(Address) (City) (State) (Zip Code)

CHECK ONE:

- Certified Public Accountant
- Public Accountant
- Accountant not resident in United States or any of its possessions.

FOR OFFICIAL USE ONLY

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See section 240.17a-5(e)(2).  
SEC 1410 (06-02)

**OATH OR AFFIRMATION**

I, Michael F. Morrison, swear (or affirm) that, to the best of my knowledge and belief, the accompanying financial statements and supporting schedules pertaining to the firm of First Command Financial Planning, Inc., as of and for the year ended September 30, 2015, are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer, or director has any proprietary interest in any account classified solely as that of a customer, except as follows:

None



A handwritten signature in black ink, appearing to be "M. F. Morrison", written over a horizontal line.

Signature

Chief Financial Officer

Title

A handwritten signature in black ink, "Angela Armstrong", written over a horizontal line.

Notary Public

**This report \*\* contains (check all applicable boxes):**

- Report of Independent Registered Public Accounting Firm.
- (a) Facing page.
- (b) Statement of Financial Condition.
- (c) Statement of Operations.
- (d) Statement of Cash Flows.
- (e) Statement of Changes in Stockholder's Equity.
- (f) Statement of Changes in Subordinated Liabilities or Claims of General Creditors.
- Notes to Financial Statements.
- (g) Computation of Net Capital.
- (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- (i) Information Relating to the Possession or Control Requirements Under Rule 15c3-3.
- (j) A Reconciliation, including appropriate explanations, of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
- (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation.
- (l) An Oath or Affirmation.
- (m) A copy of the SIPC Supplemental Report (filed separately).
- (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit (Supplemental Report on Internal Control).

\*\* For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3)

**FIRST COMMAND FINANCIAL PLANNING, INC.**

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## REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

Board of Directors  
First Command Financial Planning, Inc.

We have audited the accompanying statement of financial condition of First Command Financial Planning, Inc. (the Company) as of September 30, 2015, and the related statements of operations, changes in stockholder's equity and cash flows for the year then ended. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of First Command Financial Planning, Inc. as of September 30, 2015, and the results of its operations and its cash flows for the year then ended, in conformity with accounting principles generally accepted in the United States of America.

The supplemental information on pages 13 through 14 has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The supplemental information is the responsibility of the entity's management. Our audit procedures included determining whether the supplemental information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the accompanying supplemental information. In forming our opinion on the supplemental information, we evaluated whether the accompanying supplemental information, including its form and content, is presented in conformity with 17 C.F.R. § 240.17a-5. In our opinion, the supplemental information on pages 13 through 14 is fairly stated, in all material respects, in relation to the financial statements as a whole.

*Weaver and Tidwell, L.L.P.*

WEAVER AND TIDWELL, L.L.P.

Fort Worth, Texas  
November 23, 2015

**FIRST COMMAND FINANCIAL PLANNING, INC.**  
**STATEMENT OF FINANCIAL CONDITION**  
**SEPTEMBER 30, 2015**

**ASSETS**

Cash and cash equivalents	\$ 17,029,259
Marketable securities, at fair value	2,149,406
Commissions and fees receivable	29,897,045
Accounts receivable, prepaid expenses and other	2,268,204
Accounts receivable, affiliate	1,378
Advisor advanced commissions	1,082,056
Property, equipment, and software, net of accumulated amortization of \$2,763,578	<u>15,599</u>

**TOTAL ASSETS**

**\$ 52,442,947**

**LIABILITIES**

Accrued commissions payable	\$ 13,250,082
Accounts payable, parent company	2,936,720
Accounts payable, affiliates	370,660
Other accrued liabilities	<u>1,960,573</u>

**Total liabilities**

18,518,035

Commitments and contingencies (Note 6)

**STOCKHOLDER'S EQUITY**

Common stock	
Class A - voting	2,046
Class B - non-voting	927
Additional paid-in capital	116,805
Retained earnings	33,805,253
Treasury stock, at cost	<u>(119)</u>

**Total stockholder's equity**

33,924,912

**TOTAL LIABILITIES AND STOCKHOLDER'S EQUITY**

**\$ 52,442,947**

The Notes to Financial Statements are an integral part of this statement.

**FIRST COMMAND FINANCIAL PLANNING, INC.**  
**STATEMENT OF OPERATIONS**  
**YEAR ENDED SEPTEMBER 30, 2015**

**REVENUE**

Commission revenue	\$ 28,258,113
Asset management revenue	99,357,777
Account service fee income	<u>18,015,474</u>

**Total commissions and fee revenue** 145,631,364

Investment income	28,886
Net unrealized losses on marketable securities	(181)
Advisor service fee income	981,675
Other income	<u>264,552</u>

**Total revenue** 146,906,296

**EXPENSES**

Commissions and advisor expenses	76,025,754
General and administrative expenses	52,400,592
Interest expense	<u>14</u>

**Total expenses** 128,426,360

**NET INCOME**

\$ 18,479,936

**FIRST COMMAND FINANCIAL PLANNING, INC.  
STATEMENT OF CHANGES IN STOCKHOLDER'S EQUITY  
YEAR ENDED SEPTEMBER 30, 2015**

	Common Stock		Additional Paid-in Capital	Retained Earnings	Treasury Stock	Total Stockholder's Equity
	Class A	Class B				
<b>BALANCE, September 30, 2014</b>	\$ 2,046	\$ 927	\$ 116,805	\$ 31,825,317	\$ (119)	\$ 31,944,976
Dividend Paid	-	-	-	(16,500,000)	-	(16,500,000)
Net income	-	-	-	18,479,936	-	18,479,936
<b>BALANCE, September 30, 2015</b>	<u>\$ 2,046</u>	<u>\$ 927</u>	<u>\$ 116,805</u>	<u>\$ 33,805,253</u>	<u>\$ (119)</u>	<u>\$ 33,924,912</u>

The Notes to Financial Statements are an integral part of this statement.

**FIRST COMMAND FINANCIAL PLANNING, INC.  
STATEMENT OF CASH FLOWS  
YEAR ENDED SEPTEMBER 30, 2015**

**OPERATING ACTIVITIES**

Net income	\$ 18,479,936
Adjustments to reconcile net income to net cash provided by operating activities	
Depreciation and net amortization/accretion expense	67,939
Unrealized losses on marketable securities	181
Proceeds from maturity of marketable securities	1,000,000
Purchase of marketable securities	(1,013,850)
Changes in operating assets and liabilities	
Increase in commissions and fees receivable	(992,733)
Increase in accounts receivable, prepaid expenses and other	(317,225)
Increase in advisor advanced commissions	(1,082,056)
Net increase in accounts (receivable) payable, parent company and affiliates	1,084,745
Net decrease in accrued commissions payable	(82,199)
Net increase in other accrued liabilities	831,248
<b>Net cash provided by operating activities</b>	<b>17,975,986</b>

**INVESTING ACTIVITIES**

-

**FINANCING ACTIVITIES**

Dividend declared and paid to parent company	(16,500,000)
<b>Net cash used in financing activities</b>	<b>(16,500,000)</b>

**NET INCREASE IN CASH AND CASH EQUIVALENTS**

1,475,986

**CASH AND CASH EQUIVALENTS, beginning of year**

15,553,273

**CASH AND CASH EQUIVALENTS, end of year**

\$ 17,029,259

The Notes to Financial Statements are an integral part of this statement.

**FIRST COMMAND FINANCIAL PLANNING, INC.  
NOTES TO FINANCIAL STATEMENTS**

**NOTE 1. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

First Command Financial Planning, Inc. (the Company or FCFP), a wholly owned subsidiary of First Command Financial Services, Inc. (FCFS), was chartered in Texas in 1958, and is engaged in the sale of mutual funds, portfolio management services, and other variable investments to middle income American families with a concentration to United States military personnel. The Company is a registered investment advisor (RIA) with the Securities and Exchange Commission (SEC) and a licensed, fully-disclosed broker/dealer registered with the SEC and the Financial Industry Regulatory Agency (FINRA). The corporate office is located in Fort Worth, Texas.

**Use of Estimates**

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America (GAAP) requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Actual results could differ from those estimates.

**Recognition of Revenue**

Commission revenue on sales of mutual fund investments, variable annuities and variable universal life insurance by the Company's sales advisors is recognized when earned from the mutual fund, annuity, and life insurance companies. Commissions are paid to the Company, usually monthly, as they are earned on investments made, and premiums paid by the individual investors and policy holders.

Asset management revenue is derived from a comprehensive fee based asset management plan that provides professional investment advisory services. Asset management revenue is recognized by the Company when earned and is based upon the market value of individual investor assets under management. A third party clearing firm maintains custody of the assets. Fees are collected from individual investor accounts by the third-party custodian and are submitted to the Company on a quarterly basis.

Account service fee income includes revenue sharing bonuses received from mutual fund companies, fees for financial planning services, sub-transfer agency fees, and tax preparation fees. Account service fee income is recognized at the time the services are provided, which is generally when fees are received.

Advisor service fee income represents monthly fees paid by the Company's sales advisors for systems access, compliance, marketing, and other similar services.

**Advisor Advanced Commissions**

In 2015, the Company began advancing approximately 66 months of commissions to advisors for certain mutual fund sales. The amount advanced is treated as a prepaid

**FIRST COMMAND FINANCIAL PLANNING, INC.  
NOTES TO FINANCIAL STATEMENTS**

**NOTE 1. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES –  
CONTINUED**

**Advisor Advanced Commissions – Continued**

expense (an asset) and amortized to commission expense as commission revenue is earned on future client investment payments over the 66 months. If the account cancels or periodic investments cease during the 66 months, the unamortized amount advanced is recorded as a receivable from the advisor.

**Cash and Cash Equivalents**

For purposes of the statement of cash flows, cash and cash equivalents includes demand deposits and a money market account. Carrying value approximates fair value.

**Marketable Securities**

Marketable securities, all of which are fixed maturity debt securities, are classified as trading and recorded at fair value. Changes in fair value of these marketable securities (both realized and unrealized) are recorded in the statement of operations. Realized gains and losses are included in operations and are determined by using a specific identification basis.

**Commissions and Fees Receivable**

Commissions receivable represents \$4,618,164 due from mutual fund companies and insurance companies for the sale and servicing of investment products by the Company's sales advisors. The fees receivable represent the accrual of \$25,278,881 of fees for assets under the Company's management and are collected on a quarterly basis. Based on historical collections, no allowance is deemed necessary.

**Property, Equipment, and Software**

Property, equipment, and software are carried at cost less accumulated depreciation and amortization. Depreciation and amortization are computed using the straight-line method over the following estimated useful lives:

	<u>Estimated Lives</u>
Property and equipment	3 to 10 years
Software	5 years

Expenditures for maintenance, repairs, and minor renewals are charged to operations as incurred.

**FIRST COMMAND FINANCIAL PLANNING, INC.**  
**NOTES TO FINANCIAL STATEMENTS**

**NOTE 1. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES  
CONTINUED**

**Advertising**

The Company expenses advertising cost as incurred. Advertising expense was \$615,619 in 2015.

**Income Taxes**

Since December 1, 1998, the Company has been a Subchapter S corporation for federal income tax purposes. A Subchapter S corporation generally pays no federal income taxes, and its taxable income, if any, is taxed at the stockholder level. FCFS files a consolidated tax return that includes FCFP. Any tax positions are taken at the consolidated level.

**Concentration of Credit Risk**

Financial instruments that potentially subject the Company to concentrations of credit risk consist principally of temporary cash investments, commissions receivable, and marketable securities. The Company places its temporary cash investments and marketable securities with financial institutions and investment companies. Therefore, the majority of these funds are not insured by the Federal Deposit Insurance Corporation. Concentrations of credit risk with respect to commissions receivable are limited due to the number of investment companies comprising the Company's supplier base.

**Recent Accounting Pronouncements**

*Revenue Recognition* – The FASB has issued new guidance regarding the recognition of revenue. The core principle of the guidance is that an entity should recognize revenue to depict the transfer of promised goods or services to customers in an amount that reflects the consideration to which the entity expects in exchange for those goods or services. Management will continue to evaluate the new rule but does not expect it to have a material impact on the accounting of the Company's revenue. The guidance also includes disclosure requirements for revenue recognition. The new rule will be effective in fiscal year 2019.

**NOTE 2. RELATED PARTY TRANSACTIONS**

The Company shares office facilities, employees, and personnel costs with its parent company, FCFS. The Company and its parent also share other operating expenses. FCFS allocates costs to the Company that are clearly applicable to the operations of FCFP. A reasonable allocation method is used to allocate common expenses, or those costs not clearly applicable to any one legal entity, based on the number of new and existing client accounts purchased from FCFS, FCFP, or both. The allocation included advisor expenses,

**FIRST COMMAND FINANCIAL PLANNING, INC.**  
**NOTES TO FINANCIAL STATEMENTS**

**NOTE 2. RELATED PARTY TRANSACTIONS - CONTINUED**

rent, equipment usage, general and administrative expenses, advisor service fee income and other income. During the year ended September 30, 2015, FCFS allocated net expenses of \$45,780,867 to FCFP.

As of September 30, 2015, \$2,936,720 was due to FCFS for non-interest-bearing advances. This amount is reflected in the accompanying statement of financial condition as accounts payable, parent company. As of September 30, 2015, \$364,555 was due to an affiliate, First Command Insurance Services, Inc. and \$6,105 was due to an affiliate, First Command Europe Limited. These amounts are reflected as accounts payable, affiliates, in the accompanying statement of financial condition. As of September 30, 2015, \$1,378 was due from an affiliate, First Command Bank (FCB). This amount is reflected in the accompanying statement of financial condition as accounts receivable, affiliate. All intercompany balances are due on demand and are settled periodically by the payment of cash between the companies.

At September 30, 2015, FCFP had cash balances held at FCB of \$1,199,918.

**NOTE 3. MARKETABLE SECURITIES**

The aggregate cost and fair value of FCFP's marketable securities at September 30, 2015, are as follows:

Marketable securities, at cost	\$ 2,148,322
Unrealized gains, net	<u>1,084</u>
Marketable securities, at fair value	<u>\$ 2,149,406</u>

Unrealized gains on marketable securities declined \$181 for the year ended September 30, 2015.

Proceeds from the maturities of marketable securities were \$1,000,000 in fiscal 2015. There were no gains on the sale of marketable securities.

**Fair Value Measurements**

The Company measures the fair value of its financial assets in accordance with the hierarchy established by GAAP, which consists of three levels to indicate the quality of the fair value measurements as described below:

**FIRST COMMAND FINANCIAL PLANNING, INC.**  
**NOTES TO FINANCIAL STATEMENTS**

**NOTE 3. MARKETABLE SECURITIES - CONTINUED**

**Level 1**

Fair values are based on quoted prices in active markets for identical assets or liabilities that the Company has the ability to access as of the measurement date.

**Level 2**

Fair values are based on inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly or indirectly. Level 2 inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical or similar assets or liabilities in markets that are not active, inputs other than quoted prices that are observable for the asset or liability, or inputs that can otherwise be corroborated by observable market data.

**Level 3**

Fair values are based on inputs that are considered unobservable where there is little, if any, market activity for the asset or liability as of the measurement date. In this circumstance, the Company has to rely on values derived by independent brokers or internally-developed assumptions. Unobservable inputs are developed based on the best information available to the Company which may include the Company's own data or bid and ask prices in the dealer market.

The Company's marketable securities consist of investments in United States government sponsored agency securities and are classified as a trading portfolio. Management determines the fair values of these securities after consideration of data provided by third-party pricing services. The prices provided by third-party pricing services are based on observable market data inputs which can vary by security type. Such inputs include benchmark yields, available trades, broker/dealer quotes, issuer spreads, benchmark securities, bids, offers, and other market data. Where possible, these prices were corroborated against other independent sources. The Company has classified these securities as Level 2.

The classification of these securities as Level 2 is consistent with the fair value methods used in the prior year.

**FIRST COMMAND FINANCIAL PLANNING, INC.  
NOTES TO FINANCIAL STATEMENTS**

**NOTE 3. MARKETABLE SECURITIES - CONTINUED**

The following table represents assets measured at fair value on a recurring basis:

	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>Total</u>
Money market funds*	<u>\$ 15,515,686</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$15,515,686</u>
Marketable securities	<u>\$ -</u>	<u>\$ 2,149,406</u>	<u>\$ -</u>	<u>\$ 2,149,406</u>

\*Money market funds are included in cash and cash equivalents.

**NOTE 4. COMMON STOCK**

At September 30, 2015, the common stock of the Company is as follows:

	<u>Voting</u>	<u>Non-voting</u>
Par value per share	\$ 0.02	\$ 0.02
Number of shares authorized	750,000	750,000
Number of shares issued	102,300	46,368
Number of previously issued shares repurchased and held as treasury stock	3,100	2,834
Number of shares outstanding	99,200	43,534

**NOTE 5. NET CAPITAL REQUIREMENTS**

The Company is subject to the SEC Uniform Net Capital Rule (SEC Rule 15c3-1), which requires the maintenance of minimum net capital and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At September 30, 2015, the Company had net capital of \$13,570,350, which was \$12,335,814 in excess of its required net capital of \$1,234,536. The Company's aggregate indebtedness to net capital ratio was 1.36 to 1.

**NOTE 6. COMMITMENTS AND CONTINGENCIES**

The Company is not currently involved in or aware of any litigation that it believes could have a material adverse effect on its financial condition or results of operations.

**FIRST COMMAND FINANCIAL PLANNING, INC.  
NOTES TO FINANCIAL STATEMENTS**

**NOTE 7. SUBSEQUENT EVENTS**

Effective October 1, 2015, FCFP was restructured into two separate corporate operations. FCFP continues as a mutual fund broker/dealer and will expand its brokerage operations over time. The investment advisory services were transferred to First Command Advisory Services, a new subsidiary of FCFS. These operations include asset management and financial planning services, and consist of seventy percent of FCFP's operations in 2015.

## **SUPPLEMENTAL SCHEDULES**

**FIRST COMMAND FINANCIAL PLANNING, INC.**  
**SCHEDULE G –COMPUTATION OF NET CAPITAL PURSUANT TO RULE 15c3-1**  
**UNDER THE SECURITIES EXCHANGE ACT OF 1934**  
**SEPTEMBER 30, 2015**

<b>NET CAPITAL, total stockholder's equity</b>	<b>\$ 33,924,912</b>
 <b>DEDUCTIONS AND/OR CHARGES, non-allowable assets</b>	
Commissions and fees receivable	16,782,010
Advisor advanced commissions	1,082,056
Accounts receivable, prepaid expenses and other	2,147,788
Property, equipment, and software, net of accumulated depreciation and amortization of \$2,763,578	15,599
Accounts receivable, affiliate	1,378
Other deductions	<u>285</u>
<b>Total deductions and/or charges</b>	<u>20,029,116</u>
 <b>NET CAPITAL BEFORE HAIRCUTS ON SECURITIES POSITIONS</b>	 13,895,796
 <b>HAIRCUTS ON SECURITIES</b>	 <u>325,446</u>
 <b>NET CAPITAL</b>	 <u><u>\$ 13,570,350</u></u>
 <b>AGGREGATE INDEBTEDNESS</b>	 <u><u>\$ 18,518,035</u></u>
 <b>TOTAL AGGREGATE INDEBTEDNESS</b>	 <u><u>\$ 18,518,035</u></u>
 <b>COMPUTATION OF BASIC NET CAPITAL REQUIREMENT</b>	
Minimum net capital required to be greater of	
Minimum net capital pursuant to Rule 15c3-1(a)(1) or	\$ 100,000
Aggregate indebtedness not to exceed 15 to 1	<u>\$ 1,234,536</u>
Minimum net capital requirement	<u><u>\$ 1,234,536</u></u>
 <b>EXCESS NET CAPITAL</b>	 <u><u>\$ 12,335,814</u></u>
 <b>NET CAPITAL LESS THE GREATER OF 10% OF AGGREGATE INDEBTEDNESS OR 120% OF MINIMUM NET CAPITAL REQUIREMENT</b>	   <u><u>\$ 11,718,547</u></u>
 <b>RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL</b>	 1.36 to 1

There are no differences between the audited Computation of Net Capital included in this report and the corresponding schedule included in the Company's unaudited September 30, 2015, Part IIA FOCUS filing, as amended November 23, 2015.

**FIRST COMMAND FINANCIAL PLANNING, INC.  
SCHEDULE H – STATEMENT REGARDING RULE 15c3-3  
UNDER THE SECURITIES EXCHANGE ACT OF 1934  
SEPTEMBER 30, 2015**

First Command Financial Planning, Inc. is exempted from Rule 15c3-3 of the Securities and Exchange Commission by paragraphs (k)(2)(i) and (k)(2)(ii) of that Rule. No facts came to our attention to indicate that these exemptions had not been complied with during the year ended September 30, 2015. Refer to the Exemptive Provisions Report for stated exceptions regarding Rule 15c3-3 under the Securities and Exchange Commission Act of 1934.